

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PARK WEST GALLERIES, INC.,

**Plaintiff,**

**-against-**

THERESA FRANKS, an individual, and  
GLOBAL FINE ART REGISTRY, L.L.C.  
D/B/A FINE ART REGISTRY, JOHN  
DOES 1-10,

**Defendants.**  
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**Index No.: 12-cv-3007 (CM)  
ECF CASE**

**DECLARATION OF ALICE E. MEYER**

1. My name is Alice E. Meyer and I am an attorney for Plaintiff Park West Galleries, Inc. ("Park West") I make this declaration on personal knowledge pursuant to the provisions of 28 U.S.C. § 1746. I submit this declaration in opposition to the motion by defendants Theresa Franks and Global Fine Art Registry LLC ("FAR") to dismiss this action for lack of personal jurisdiction and improper venue.

2. During the period from May 2, 2012 through May 24, 2012, I searched Defendants' website, [www.fineartregistry.com](http://www.fineartregistry.com).

3. I personally viewed the web pages described herein, and captured the screen shots attached to Park West's Response.

4. Attached hereto as Exhibit 1 is a screen shot of FAR's home page.

5. Attached hereto as Exhibit 2 is a screen shot of the first page of FAR's "Hot Headline" article entitled *Round 2 – Park West Gallery Litigation Update #77*.

6. Attached hereto as Exhibit 3 is a screen shot of the last page of FAR's "Hot Headline" article entitled *Round 2 – Park West Gallery Litigation Update #77*.

7. Attached hereto as Exhibit 4 is a screen shot of the screen displayed when one clicks on the *FAR Help Desk* button.

8. Attached hereto as Exhibit 5 is a screen shot of the screen displayed when one clicks on the *Park West victims click here* button.

9. Attached hereto as Exhibit 6 is a screen shot of the order screen for FAR's *Dali Fakes Investigation* video.

10. Attached hereto as Exhibit 7 are screen shots of two of the order screens for FAR's *Art and the Law* Lecture videos.

11. Attached hereto as Exhibit 8 is a screen shot of the order screen for FAR's Consultation Services.

12. Attached hereto as Exhibit 9 is a FAR membership list through 2005 that I obtained from the FAR website. That list contains fifteen (15) New York residents with FAR memberships through 2005.

13. Attached hereto as Exhibit 10 is a screen shot of the screen displayed when one clicks on the hotlink to *Tag, Register and Organize your Art and Collectibles* on the FAR home page.

14. Attached hereto as Exhibit 11 is a screen shot of the *FAR Partners* screen available on the FAR website.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 25, 2012.

  
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Alice E. Meyer